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8 **UNITED STATES DISTRICT COURT**
 9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 (Honorable Peter C. Lewis)

11	UNITED STATES OF AMERICA,)	Magistrate Case No. 08mj8512
12	Plaintiff,)	JOINDER TO NOTICE OF MOTION AND
13	v.)	MOTION FOR VIDEOTAPE DEPOSITION
14	Adrian Tejada-Garduza, et al.,)	OF MATERIAL WITNESS AND REQUEST
15	Material Witnesses.)	FOR STATEMENT OF REASONS IN
16)	SUPPORT OF COSTODY
17			HRG DATE: 08/08/2008
			TIME: 10:00 a.m.
			CRTRM: El Centro - 2 nd Floor
			JUDGE: Peter C. Lewis

18 TO UNITED STATES ATTORNEY KAREN P. HEWITT, AND TO THE ATTORNEYS
 19 OF RECORD FOR CARLOS RAMOS-GALAMEZ AND JOUANNI FRANCISCO PEREZ-
 20 TINOCO, DEFENDANTS NAMED IN CRIMINAL CASE NUMBER 08CR1696-H
 21 ASSOCIATED HEREWITH:

22 PLEASE TAKE NOTICE that material witnesses Ruben Valadez-Arrendondo; Eusebio
 23 Martinez-Perez; Miguel Najera-Lopez; and Brenda Garcia-Ontiveros ("Material Witnesses") by and
 24 through their counsel, Alan E. Ferguson, join in the motion to set videotape depositions filed by
 25 Tamara D. DeHaan, for material witness Adrian Tejada-Garduza, to be heard on August 8, 2008,
 26 at 10:00 a.m., or as soon thereafter as counsel may be heard. The proposed order submitted by
 27 Tamara D. DeHaan is identical to that proposed by these four material witnesses, and therefore shall
 28 be submitted to the court via e-mail prior to the hearing.

1 **MOTION**

2 Material witnesses Ruben Valadez-Arrendondo; Eusebio Martinez-Perez; Miguel Najera-
3 Lopez; and Brenda Garcia-Ontiveros (“Material Witnesses”) by and through their counsel, Alan E.
4 Ferguson, and pursuant to Federal Rules of Criminal Procedure, Rule 15, 18 U.S.C., §3144; and 18
5 U.S.C., §3142, hereby move this Court for an order to take their depositions by videotape, and
6 release them at the conclusion of the depositions.

7 This motion is based on this joinder of motion, the memorandum of points and authorities
8 and declarations submitted by Tamara D. DeHaan, attorney of record for Adrian Tejada-Garduza,
9 filed herein, the records of the above-titled case, and all matters submitted to the court prior to the
10 determination of this motion.

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12 Dated: August 4, 2008

13 By: / S / Alan E. Ferguson
14 ALAN E. FERGUSON
15 Attorney for the Material Witness
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

(Honorable Peter C. Lewis)

11 UNITED STATES OF AMERICA,) Magistrate Case No. 08mj8512
12 Plaintiff,)
13 v.) DECLARATION OF SERVICE
14 Adrian Tejada-Garduza, et al.,) Persons Served: Gary Burcham, Esq.;
15) Stephen Demik, Esq.;
16 Material Witnesses.) U.S. Attorney; and
17 Under penalty of perjury, I declare:
18) Tamara DeHaan, Esq.

19 1. I am an attorney duly licensed to practice law in the State of California, and before the
20 United States District Court for the Southern District of California. I am over the age of eighteen
21 and not a party to this action.

22 2. On August 4, 2008, I served the above-named persons with the following document:
23 Joinder to Notice of Motion and Motion for Videotape Deposition of Material Witnesses and
24 Request for Statement of Reasons in Support of Custody.

25 3. Service was effected by e-filing the document with the Southern District Court via
26 CM/ECF and via e-mail.

27 Dated: August 4, 2008

28 By: / S / Alan E. Ferguson
ALAN E. FERGUSON
Attorney for the Material Witnesses